

These comments are respectfully submitted on behalf of the San Francisco Bay Area Chapter of the American-Arab Anti-Discrimination Committee (ADC-SF). ADC-SF is a grass roots organization committed to the protection of the civil rights of all people, with a special focus on issues affecting individuals of Arab descent.

We are concerned that, although the Commission issued a Notice of Proposed Rulemaking on media ownership, no actual proposed rule upon which the public can effectively comment has been released. We therefore have had no meaningful opportunity to comment on specific changes and their possible effects on media diversity. Given that this rule could seriously impact the availability of news and information for so many people, the FCC should provide the actual text of the proposed rule and extend the comment period. This will permit the public to provide relevant comments on the proposed rule for the FCC's consideration.

ADC-SF is concerned that any rule change permitting greater concentration and cross-ownership of media may limit the public's access to a wide range of news and opinions. Access to a diverse spectrum of opinions is a necessary pre-requisite for a society to function as a democracy. Media diversity is especially significant for immigrant populations and communities of color. Stories of interest to minority populations are often shunted aside by the mainstream media. In California alone, over 1,000 ethnic media outlets exist providing news coverage that the corporate news media like AOL Time Warner, Disney, and Viacom often neglect. A loosening of media ownership rules will likely lead to greater media consolidation and produce less competition and less choice for immigrant communities. Moreover, consolidation will likely lead to reduced coverage of local-interest stories as mega-media outlets favor stories that can be released nationally and internationally. This would dampen interest in local issues, thereby reducing local civic activity.

For all the above reasons, we urge the FCC not to adopt any changes on media ownership or cross-ownership rules at this time.

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